

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

-----X	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
-----X	:	

**CITY OF DETROIT'S STATEMENT REGARDING
DESIGNATION OF THE CONTENTS OF THE RECORD ON APPEAL**

The City of Detroit, Michigan (the "City") is the Debtor in this chapter 9 case and appellee with respect to various appeals of this Court's *Order Confirming the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit* (Docket No. 8272) (the "Confirmation Order"). On December 10, 2014, Mr. Thomas J. Cipollone filed the *Designation of the Content of the Record and Statement of Issues on Appeal* (Docket No. 8643).¹ The City states that it filed

¹ Pursuant to Federal Rule of Bankruptcy Procedure 8009(a)(1)(B) and the Notice of Requirement to File Designation (Docket No. 8463), entered by the Court on November 25, 2014, appellant Thomas J. Cipollone was required to file the Cipollone Designation within 14 days of having filed his notice of appeal of the Confirmation Order. Because (a) Mr. Cipollone's notice of appeal (Docket No. 8462) was filed on November 25, 2014, (b) the deadline for filing the Cipollone Designation was thus December 9, 2014

its counter-designation of the record pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure in response thereto on December 15, 2014 (Docket No. 8758) which is incorporated herein by reference.

Dated: December 15, 2014

Respectfully submitted,

/s/ Heather Lennox

David G. Heiman (OH 0038271)
Heather Lennox (OH 0059649)
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
dgheiman@jonesday.com
hlennox@jonesday.com

Bruce Bennett (CA 105430)
JONES DAY
555 South Flower Street
Fiftieth Floor
Los Angeles, California 90071
Telephone: (213) 243-2382
Facsimile: (213) 243-2539
bbennett@jonesday.com

Thomas F. Cullen, Jr. (DC 224733)
Gregory M. Shumaker (DC 416537)
Daniel T. Moss (DC 983269)
JONES DAY
51 Louisiana Ave., N.W.
Washington, D.C. 20001
Telephone: (202) 879-3939
Facsimile: (202) 626-1700
tfcullen@jonesday.com
gshumaker@jonesday.com
dtmoss@jonesday.com

Robert S. Hertzberg (P30261)
Deborah Kovsky-Apap (P68258)
Pepper Hamilton LLP
4000 Town Center, Suite 1800
Southfield, MI 48075
(248) 359-7300 - Telephone
(248) 359-7700 - Fax
hertzbergr@pepperlaw.com
kovskyd@pepperlaw.com

ATTORNEYS FOR THE CITY

and (c) the Cipollone Designation was filed on December 10, 2014, the Cipollone Designation is untimely.

CERTIFICATE OF SERVICE

I, Heather Lennox, hereby certify that the foregoing City of Detroit's Statement Regarding Designation of the Contents of the Record on Appeal was filed and served via the Court's electronic case filing and noticing system on this 15th day of December, 2014.

/s/ Heather Lennox